

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

OSCAR YANES, et al.,

Petitioners-Plaintiffs,

v.

DANIEL W. MARTIN, et al.,

Respondents-Defendants.

Civil Action No. 1:20-cv-00216

**PETITIONERS' NOTICE OF SUPPLEMENTAL EXHIBITS
IN SUPPORT OF BAIL APPLICATION OF YARA CHUM**

Petitioners respectfully submit the following supplemental exhibits in support of the bail application of class member Yara Chum (ECF No. 404), attached hereto and to the accompanying motion to seal:

- Ex. L, Declaration of Patrick Westfall;
- Ex. M, Email from Rhode Island Parole Board Administrator Matthew Degnan, to Morgan Russell;
- Ex. N, Description of SRG Step Down Program Community Support and Counseling, Michele Almeda, MS, LMHC;
- Ex. O, Declaration of Elizabeth Toll, MD, with CV;
- Ex. P, Medical Record, Nov. 24, 2020;*
- Ex. Q, Medical Record, Dec. 1, 2020.*

Exhibits L and M reflect that the OpenDoors 9 Yard facility in Pawtucket, to which Mr. Chum was previously scheduled to be released on parole by the Rhode Island Department of Corrections, is ready to accept Mr. Chum should he be released, following a two-week quarantine at OpenDoors' Plainfield Street facility in Providence; and that the Rhode Island

* Exhibits Q and R are personal medical records and being filed concurrently with attached to a motion to seal.

Parole Board approves of this proposal for release so long as Mr. Chum is subject to GPS monitoring and receives mental health counseling.

Exhibit N reflects the continuing mental health counseling services that would be available to Mr. Chum upon release through the SRG Step Down Program he completed during his incarceration by the Rhode Island Department of Corrections.

Exhibits O, P, and Q concern Mr. Chum's continuing risk for infection with COVID-19. Exhibits P and Q are personal medical records of Mr. Chum and are being filed under a separate motion to seal.

Dated: December 10, 2020

Respectfully Submitted,

s/ Morgan Russell

Morgan Russell

American Civil Liberties Union Foundation

Immigrants' Rights Project

39 Drumm Street

San Francisco, CA 94111

mrussell@aclu.org

Certificate of Service

I hereby certify that on December 10, 2020, I electronically filed the foregoing document with the United States District Court for the District of Rhode Island by using the CM/ECF system. I certify that all parties or their counsel of record are registered as ECF Filers and will be served by the CM/ECF system.

/s/ Morgan Russell
Morgan Russell